<u>REMARKS</u>

This application has been reviewed in light of the Office Action dated April 30, 2008. Claims 1-26 and 28-31 are pending in this application, of which Claims 1, 13, 14, 26 and 28-31 are in independent form. Claims 30 and 31 have been amended to define still more clearly what Applicants regard as their invention, and Claims 1, 4, 9, 14 and 26 have been amended to correct minor informalities noted therein. Favorable reconsideration is respectfully requested.

Claims 30 and 31 were rejected under 35 U.S.C. § 101 as directed to non-statutory subject matter, and specifically, because the phrase "...computer-readable medium..." was deemed by the Examiner not to exclude the possibility that the claimed medium was a signal. This rejection is based on the thinking that, even though these claims are directed to a computer-readable medium, which the MPEP accepts as being statutory in most circumstances, the absence from the specification of a definition of "medium" that expressly excludes a signal as such, makes it reasonable to read these claims as encompassing signals. Applicants do not agree with the Examiner's analysis and conclusions for the following reasons.

Claims 1 and 13, directed to methods, state that the claimed methods are computer-implemented. Claims 30 and 31 are not directed to programs as such, but to tangible products, namely computer-readable media that store programs. (It is noted that while information such as executable computer code could certainly be encoded in a signal, it is not believed that those skilled in the art would under any conditions say that that information was "stored" in the signal.)

Under current USPTO practice the rejection might perhaps be warranted if the specification affirmatively suggested that signals were intended to be included within the scope of the word "medium". However, the present application does not make such a suggestion. Accordingly, Applicants submit that the rejection of Claims 30 and 31 under 35 U.S.C. §101 is not warranted.

Nonetheless, to eliminate this as an issue and to expedite prosecution of this application, Claims 30 and 31 have been amended to recite expressly that the claimed medium does not include a signal. Applicants respectfully request withdrawal of the rejection under Section 101.

Claims 1-26 and 28-31 were rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent Application Pub. No. 2005/0018696 A1 (hereinafter *Henry '696*).

By way of background, Applicants note that HAVi is an interoperability standard that allows high-level communications (interoperability) between devices as long as the devices belong to the same network (IEEE 1394). The present invention addresses the problem of how to allow a HAVi device to communicate with a second device located in a second network.

In the aspect of the present invention set out in independent Claim 1, this problem is solved by determining a global unique identifier for each device from the second network, determining an IEEE 1394 address for each device from the second network, and representing each device from the second network by a HAVi compliant software element hosted by a gateway. Communication between the devices can be

managed by using, for each device on the second network, a corresponding software element associated with the global unique identifier and the IEEE 1394 address.

More specifically, independent Claim 1 is directed to a method of interconnection, through a gateway, between a first network of type IEEE 1394 enabling communications between a plurality of HAVi compliant devices and a second network enabling communications between a plurality of devices, which method comprises, for each device from the second network, a) determining a distinct global unique identifier, b) determining a distinct IEEE 1394 address, and c) representing the device from the second network by a HAVI compliant software element associated with the determined global unique identifier and the determined IEEE 1394 address, which software element is hosted by the gateway. The method also comprises managing communication between a device from the first network and a device from the second network using the device from the second network's corresponding software element.

Henry '696 relates to a method of communicating between a UPnP network and a HAVi network. As explained in paragraph [0062] at page 3 of Henry '696, in order to communicate, a stream crosses the bridge between the networks. The stream is not considered to be a local stream, but is considered to be a multiclustered stream. A stream manager is aware of the existence of the bridge and whether or not a device is on a local cluster or a remote cluster. In order to achieve this *Henry '696* requires that the HAVi specification be amended to make the stream manager bridge aware.

At least one advantage of the method of Claim 1 is that because packets sent over the gateway appear to be local packets, there is no need to modify the HAVi specification to make the stream manager bridge aware.

The method of Claim 1 is not taught or suggested by *Henry '696*, because, to begin with, that document does not disclose determining a distinct IEEE 1394 address for each device from the second network. This feature is not explicitly discussed in *Henry '696*, and in fact the absence of this step can be understood plainly from paragraph [0068]. In paragraph [0068], *Henry '696* explains that when a new device is added to the UPnP network, "A new GUID is then created by the bridge for this new IP device. The bridge device updates its GUIDL register and sends a NetworkChanged event on the HAVi side, to announce connection of the new device. This will not generate a bus reset on the HAVi cluster." Applicant submits that in a 1394 system, a bus reset usually occurs upon change of a node. During the bus reset new 1394 addresses are created according to a defined system. Therefore, in the case described at pagraph [0068] of *Henry '696*, the absence of a bus reset in the system described in *Henry '696* means that a person skilled in the art would understand that a 1394 address is not assigned to the new UPnP device, contrary to the recitations of Claim 1.

For all these reasons, it is believed to be clear that Claim 1 is allowable over *Henry '696*.

Independent Claims 13, 14, 26 and 28-31 each contain recitations like those discussed above with regard to Claim 1, and are believed to be patentable for at least the same reasons as discussed above in connection with Claim 1.

A review of the other art of record has failed to reveal anything which, in Applicants' opinion, would remedy the deficiencies of the art discussed above, as a reference against the independent claims herein. Those claims are therefore believed patentable over the art of record.

The other claims in this application are each dependent from one or another of the independent claims discussed above and are therefore believed patentable for the same reasons. Since each dependent claim is also deemed to define an additional aspect of the invention, however, the individual reconsideration of the patentability of each on its own merits is respectfully requested.

In view of the foregoing amendments and remarks, Applicants respectfully request favorable reconsideration and early passage to issue of the present application.

Applicants' undersigned attorney may be reached in our New York office by telephone at (212) 218-2100. All correspondence should continue to be directed to our below listed address.

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